

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
LEA B. STRICKLER,	:	BANKRUPTCY NO. 19-12421-pmm
Debtor	:	
	:	CHAPTER 13
	:	
	:	L.B.R. 9014-3
PENNSYLVANIA HOUSING FINANCE	:	
AGENCY	:	
	:	
Movant	:	HEARING: APRIL 25, 2023
	:	at 10:00 A.M.
vs.	:	The Gateway Building
	:	201 Penn Street, 4 <sup>th</sup> Floor
	:	Reading, PA
LEA B. STRICKLER and	:	
SCOTT F. WATERMAN, Trustee	:	
Respondents	:	

**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

TO THE HONORABLE PATRICIA M. MAYER, U. S. BANKRUPTCY JUDGE:

AND NOW comes Pennsylvania Housing Finance Agency, by its attorneys, Purcell, Krug & Haller, and files this Motion to obtain relief from the automatic stay pursuant to Section 362(d) of the Bankruptcy Code as follows:

1. That this is a contested matter under Rule 9014 brought pursuant to 11 USC Section 362(d).
2. Movant, Pennsylvania Housing Finance Agency, is a company with an office located at 211 North Front Street, Harrisburg, Pennsylvania 17101.
3. Respondent, Lea B. Strickler is an adult individual whose last known address is 404 Green Terrace, Reading, PA 19601.
4. Respondent, Scott F. Waterman, is the Trustee duly appointed in the above case with a place of business at 2901 St. Lawrence Avenue, Suite 100, Reading, PA 19606.
5. On or about July 30, 2013, Respondent executed and delivered a Mortgage Note in the sum of \$88,268.00 payable to Mortgage America, Inc., which Note is attached hereto and marked Exhibit "A".

6. Contemporaneously with and at the time of the execution of the aforesaid Mortgage Note, in order to secure payment of the same, the Respondent made, executed, and delivered to original Mortgagee, a certain real estate Mortgage which is recorded in the Recorder of Deeds Office of the within County and Commonwealth on August 12, 2013 as Instrument Number 2013034362 conveying to original Mortgagee the subject premises. The Mortgage was subsequently assigned to Pennsylvania Housing Finance Agency and was recorded on October 28, 2013 in the aforesaid County as Instrument Number 2013045505. The Mortgage was further assigned to U.S. Bank National Association, Trustee for the Pennsylvania Housing Finance Agency and was recorded on April 15, 2015 in the aforesaid County as Instrument Number 2015012024. The Mortgage was further assigned to Pennsylvania Housing Finance Agency and was recorded on February 1, 2017 in the aforesaid County as Instrument Number 2017004089. The said Mortgage and Assignments are incorporated herein by reference.

7. The land subject to the Mortgage is known and numbered as 404 Green Terrace, Reading, PA 19601.

8. The balance owed Movant is approximately \$159,500.00.

9. Other liens against the property (per Debtor's Schedules): Reading Area Water Authority in the amount of \$2,262.00.

10. The value of the real estate is approximately \$103,550.00 (per Debtor's Schedules).

11. After allowance of exemptions to which Debtor has claimed in the Bankruptcy Petition, the value of the aforesaid property to be sold is grossly insufficient to pay the record liens against the property, as well as costs that could be incurred by the Trustee in selling said property.

12. No equity exists in said property for the benefit of the unsecured creditors.

13. Debtor has failed to make thirteen (13) postpetition mortgage payments to Movant in the amount of \$1,135.03 each.

14. Movant is entitled to relief for cause.

WHEREFORE, Movant prays for the entry of an Order terminating the automatic stay and granting Movant leave to exercise its State Court foreclosure rights and that such further relief be granted as your Honorable Court deems fair and equitable.

PURCELL, KRUG & HALLER

By: /s/Leon P. Haller  
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Dated: March 29, 2023